#### **REMARKS**

The Office Action dated July 30, 2004 has been carefully considered. In response to the Office Action, Applicants have amended the application. Applicants request that the Examiner consider the following remarks, and then pass the application to allowance.

# **Changes in the Specification**

By the present amendment, Applicants have amended the Specification to correct typographical errors.

# **Pending Claims**

Claims 1-4, 6-18, 20-32, 34-43 and 45-53 are pending. Claims 5, 19, 33 and 44 have been cancelled by the present amendment.

#### Art Rejection Under 35 U.S.C. § 102(b)

In the Office Action, claims 1,2,9,15,16,23,29-30,37,40,41 and 48 were rejected under 35 U.S.C. § 102(b) as being anticipated by Hawthorne et al. (U.S. Pat. No. 5,764,209). By the present amendment, Applicants have amended independent claims 1,15,29 and 40 to recite the novel and unobvious aspects of the present invention.

Specifically, independent claims 1,15,29 and 40 recite a system and method for providing a consistent visual appearance of one or more pixels of a display screen. A viewing position is first established based upon one or more received user

inputs. Next, a correction factor is applied to one or more corresponding pixel level values. The correction factor is based on a respective viewing angle formed between a specific location on the display screen and the viewing position. Next, a change in the relative orientation between a display orientation and the viewing position is detected. A second respective different correction factor is then applied to the corresponding pixel level values in response to the detected change in the relative orientation. Accordingly, the display can be moved but the appearance of the pixels remains consistent.

Applicants respectfully submit that Hawthorne does not disclose the continuing process of detecting a change in a relative orientation between the display orientation and the viewing position and then applying a second different correction factor based on the detected change in the relative orientation. As understood, Hawthorne discloses a testing system for a flat-panel display that detects the brightness across the display. The image from the display can be analyzed to detect anomalies in the pixels. The anomalies in the pixels due to uneven brightness across the display can be corrected by programming a memory chip for the display panel that <u>permanently</u> compensates the display driver signals for each display pixel to eliminate the anomalies in the display.

There is no teaching or suggestion within Hawthorne that the anomalies are continually corrected for different viewing angles of the display. Hawthorne is concerned with compensating for anomalies at a single fixed viewing angle by varying the brightness of the display. In this regard, Hawthorne discloses programming a memory chip of the display with only one set of <u>permanent</u> values that compensate the brightness of the display in order to correct the anomalies.

There is not teaching or suggestion that multiple values are programmed such that independent claims 1, 15, 29 and 40 are in condition for allowance.

### Art Rejection Under 35 U.S.C. § 103(a)

In the Office Action, claims 3-4,7,17-18,21,31-32,35,42,43 and 46 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Hawthorne in view of Shirriff (U.S. Pat. No. 6,094,185). However, Applicants respectfully submit that independent claims 1,15,29 and 40 are in condition for allowance because neither Hawthorne or Shirriff teach or suggest detecting a change in orientation of the display and then applying different correction factors.

In the Office Action, claims 5,6,10,11,19,20,24,25,33,34,38,39,44,45,49, and 50 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the combination of Hawthorne and Tomita (U.S. Pat. No. 5,764,209). Applicants respectfully submit that the combination of Hawthorne and Tomita does not disclose the present invention because Hawthorne teaches away from the combination. As previously discussed, Hawthorne teaches detecting the brightness of the display at a single viewing angle and programming a memory chip for the display for only that one viewing angle. As understood, Tomita discloses a display wherein the brightness or contrast for the whole display is adjusted in response to the viewing angle. As the seat back to which the display is mounted is reclined, the brightness or contrast of the display is adjusted in order to provide optimal viewing of the display.

Applicants respectfully submit that there is no motivation to combine

Hawthorne and Tomita as suggested in the Office Action because Hawthorne

discloses <u>permanently</u> compensating the display driver signals of the display to only compensate for one viewing angle. Hawthorne at column 9, lines 17-25 discloses that final compensation factors for each of the display pixels are stored in a lookup table that may be down-loaded into an EPROM chip for the display panel being tested. The EPROM chip is then installed in a drive system for the display panel to <u>permanently</u> control the compensation of the display. In this respect Hawthorne discloses a fixed and <u>permanent</u> set of compensation factors that are used to compensate the display brightness.

Accordingly, Hawthorne cannot be combined with Tomita to disclose the present invention as claimed because Hawthorne teaches away from using multiple compensation factors. As previously discussed above Hawthorne teaches applying a set of permanent compensation factors to the display. The compensation factors are determined for a single fixed viewing angle with the test system such that only a single set of permanent compensation factors are used to optimize viewing.

Accordingly, Hawthorne specifically teaches away from using multiple sets of compensation factors in favor of a set of permanent compensation factors.

Applicants respectfully submit that independent claims 1,15,29 and 40 are in condition for allowance because it is improper to combine Hawthorne with Tomita.

In the Office Action, claims 8,22,36 and 47 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Hawthorne in view of Tomita and Shirriff.

Applicants respectfully submit that claims 8, 33, 36 and 47 are in condition for allowance as being dependent upon an allowable base claim as stated above.

Furthermore, in the Office Action, claims 12-14,26-28, and 51-53 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Hawthorne in view of

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Tomita and Lanier (U.S. Pat. No. 6,400,374). Applicants respectfully submit that

claims 12-14,26-28 and 51-53 are in condition for allowance as being dependent

upon an allowable base claim as stated above.

Conclusion

In view of the preceding discussion, Applicants respectfully urge that the

claims of the present application define patentable subject matter and should be

passed to allowance. Such allowance is respectfully requested.

If the Examiner believes that a telephone call would help advance prosecution

of the present application, the Examiner is invited to contact Applicants'

representative at the telephone number listed below.

Respectfully submitted,

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